

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

BLUE CROSS BLUE SHIELD OF
MICHIGAN, a nonprofit mutual
insurance company,

Plaintiff-Counter
Defendant,

Case No.: 2:21-CV-10076

v.

BOND PHARMACY, INC., D/B/A
ADVANCED INFUSION
SOLUTIONS, a Mississippi
corporation,

District Judge Denise Page Hood

Magistrate Judge Kimberly G. Altman

Defendant-
Counterclaimant.

INITIAL FACT WITNESS LIST

Pursuant to the Court's Scheduling Order [Dkt. 52], Defendant Bond Pharmacy, Inc., d/b/a Advanced Infusion Solutions ("AIS") submits the following initial fact witness list.

The parties are in the process of exchanging a substantial volume of documents, and discovery of third parties remains to be completed. At this stage, AIS cannot yet identify with certainty those witnesses it would call at trial and therefore reserves the right to add to, delete from, and otherwise amend this Witness List.

Subject to the foregoing, AIS states that it may call the following witnesses at trial:

Current and Former AIS Employees c/o counsel:

1. **Beverly Aborne**, Vice President of Financial Services.
2. **Joel Yerton**, Senior Vice President of Market Access and Payor Relations.

3. **Ross Kamm**, Chief Financial Officer.
4. **Simon Castellanos**, Chief Executive Officer.
5. **Pam Foreman**, Former Collections Specialist.

Current and Former BCBSMI Employees:

1. **Ferren Gibson**, Manager of Provider Enrollment Data Management.
2. **Todd Van Tol**, Executive Vice President.
3. **Jeff Connolly**, Senior Vice President and President.
4. **Susan Barkel**, Senior Vice President, Provider Contracting and Network Operations.

5. **Thomas Rybarczyk**, Provider Clinical Consultant.
6. **Dr. Atheer Kaddis**, Vice President, Pharmacy Services.
7. **Lisa Sivell**, Director, Medical Benefit Clinical Management.
8. **Matt Glenn**, Healthcare Manager.
9. **Jim Gallagher**, Manager, Pharmacy Services.

10. **Dr. Robert Digby**, Medical Director – Utilization Management.
11. **Denise DeVooght**, Crime Fraud Investigator.
12. **Amy Walker**, Crime Fraud Investigator.
13. **Ibrahim Selman**, Manager – Provider Audit.
13. **Laurie Latvis**, Director of Quality and Provider Outreach.
14. **Kurt Prettenhofer**, Manager Hospital Contracting and MA PPO

Network Management.

15. **Maria Martinez**, Assistant General Counsel.
16. **Christopher Bernard**, Senior Attorney.
17. **Nicole M. Wotlinski**, Vice President, Deputy General Counsel.
18. **Laurie Parmely**, Vice President, General Counsel.

Other Witnesses:

1. Any and all individuals listed on the parties' Initial Disclosures and the parties' discovery responses;
2. Any and all witnesses discovered through the normal course of discovery between now and the date of the trial in this matter;
3. Any experts identified by Plaintiff or Defendant;
4. Any and all witnesses required for rebuttal or impeachment purposes;
5. Any person whose deposition has or will be taken in this matter;
6. Any person who created, sent or received any exhibit; and

7. Any and all witnesses necessary to refute Plaintiff/Counter-Defendant's allegations against Defendant/Counter-Plaintiff.

Dated: December 6, 2024

Respectfully submitted,

/s/ Larry R. Jensen

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Counsel for Defendant-Counterclaimant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically on December 6, 2024, using the CM/ECF system, which will give notice of such filing to counsel of record at their registered electronic mail addresses.

Dated: December 6, 2024

/s/ Larry R. Jensen
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